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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
MAURICE BIBBS,)
)
Defendant.)
_____)

No. CR 07-0336 WHA

**UNITED STATES' SENTENCING
MEMORANDUM**

The parties have entered into a plea agreement with a proposed sentence of ninety-six months of imprisonment. The government remains in agreement with that recommendation. Should the Court disagree with the combined recommendations from defendant, the government, and the Probation Officer, then the government will be prepared for trial.

This case involves an act of extreme violence and cowardice – stealing a car at gunpoint from a pregnant woman. The defendant followed that activity by making threatening phone calls to his victim. Were it not for the defendant's young age, the government would not have entered into this agreement with him. The standard sentence for a 924(c) violation where the defendant

1 brandishes the weapon is eighty-four months. The parties have agreed to a twelve month upward
2 adjustment to that standard sentence due to the defendant's follow-up efforts to obstruct justice.
3 Ninety-six months is, therefore, an appropriate sentence in the government's view.

4
5 DATED: June 16, 2008

Respectfully submitted,

6 JOSEPH P. RUSSONIELLO
7 United States Attorney

8 /s/
9 William Frentzen
Assistant United States Attorney